



**HILDA CANTÚ MONTÓY**  
City Attorney

September 8, 2003

**MEMORANDUM**

**TO: Mayor & Council**

**RE: Mass Mailings**

We have previously advised that publicly funded mailers are subject to the Fair Political Practices Commission mass mailing regulations (2 California Code of Regulations 18901). We included an overview of the Political Reform Act mass mailing provisions in the attached April 22, 2003 memorandum.

From time to time we review draft mailers for you. While we may determine that a draft mailer meets mass mailing requirements, please note that any formal or informal alterations, including handwritten notes and signatures, of a mass mailing document may threaten its legality. If changes subsequent to our review are necessary, please resubmit them to our Office and we will provide a final review. We are available to address any questions on this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James C. Sanchez".

**JAMES C. SANCHEZ**  
Chief Assistant City Attorney

Attachment

JCS:prn[28231prn/jcs]



HILDA CANTÚ MONTÓY  
City Attorney

April 22, 2003

## MEMORANDUM

TO: Mayor  
Council

RE: Mass Mailers  
CA File No. 3499.5

### INTRODUCTION

We take this opportunity to provide guidance on the mass mailing restrictions under the Political Reform Act (PRA). The topic of mass mailing is also addressed in the City of Fresno Municipal Law Guidebook, which was distributed in hard copy to the elected officials, and is available on the City website. This memorandum does not address a related issue, on the permissible use of public funds, which are governed by additional state and local laws.

### SUMMARY

Whenever public funds are used in producing or distributing informational material, the item must be in compliance with the mass mailing restrictions of the PRA. The applicable restrictions will depend on the nature of the item, the number of items sent in a calendar month, and the manner of distribution. We have set forth various scenarios relating to the item, based on these factors.

1. The item is exempt from the mass mailing restrictions of the PRA, under the following circumstances:

- If no public funds are used in the production or distribution of the item.
- If 200 items or less are sent within a single calendar month.
- If the item does not feature an elected officer.

- If the item is not delivered by any means to a resident's home, business, or post office box. For example, items that are handed out at a public area, or are set out for the public to pick up on their own, are not considered "delivered" under the PRA. By contrast, items that are hand delivered to a resident's home, are considered "delivered" for purposes of the PRA.
- If an item is sent in response to an unsolicited request. A request is unsolicited, if it is not requested or induced by the elected officer or any other third person acting at his or her bequest.

2. If the item is subject to the mass mailing requirements, the item must come within any of the exceptions to the mass mailing prohibition under Regulation 18901(b). We have attached a copy of Regulation 18901.

3. If a Councilmember wants to deliver a neighborhood directory guide that only features that Councilmember and is not otherwise exempt under Number 1 above, the letterhead exceptions appears applicable. The requirements for the letterhead exception are as follows:

- The item must be on the elected officer's stationary.
- The elected officer's name may only appear in the letterhead or logo type of the stationary, except as permitted under Regulation 18901.
- If no additional exception in Regulation 18901(b) applies, the item may not include elected officer's photograph, signature, or any other reference to the elected officer, other than in the logotype or letterhead of the stationary. As a caveat, use of such words as "I," "me," "my," and "our" is counted as a reference to the elected official.<sup>1</sup> However, reference to a council district by number, such as the "fourth district," is not counted as a reference to the elected official representing the district.<sup>2</sup>

4. If any Councilmember has delivered any item that is not exempt under Number 1, nor in compliance with any of the exceptions in Regulation 18901(b), we strongly recommend that the Councilmember contact the Fair Political Practices Commission (FPPC) for further instructions on the matter. We have attached the most

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<sup>1</sup> Bustamonte Advice Letter, FPPC No. A-99-265; and Thorson Advice Letter, FPPC No. A-92-022.

<sup>2</sup> Calhoun Advice Letter, FPPC No. A-92-043.

recent FPPC advice letter requested by former Councilmember Henry Perea. The advice letter contains a discussion of the letterhead exception and on "unsolicited requests," which we hope will be helpful.

### **OVERVIEW OF THE MASS MAILING PROVISIONS UNDER THE PRA**

The PRA prohibits newsletters and mass mailings to be sent at public expense.<sup>3</sup> The purpose of this state law is to ensure that incumbents do not receive an unfair advantage over challengers in the next election. Therefore, the PRA prohibits elected officials from using public moneys to perpetuate themselves in public office.<sup>4</sup> The FPPC adopted Regulation 18901 to clarify which mailings are permissible or prohibited under the PRA.

**A. Mass mailing of an item is prohibited, if all of the following criteria in Regulation 18901(a) are met:**

1. Any tangible item is delivered to a recipient at his or her residence, place of employment, business, or post office box.
2. The item sent either:
  - (a) features an elected officer affiliated with the agency sending or producing the mailing, or
  - (b) includes the name, photograph, or other reference to an elected officer affiliated with the agency which produces or sends the mailing, which is prepared or sent in concert with the elected officer.
3. Any of the costs of distribution is paid for with public moneys, or if more than \$50 in public moneys is used for the costs of design, production, or printing, with the intent of sending the item.
4. More than two hundred substantially similar items are sent, in a single calendar month, excluding any item sent in response to an unsolicited request, and any item that falls within the exceptions in Regulation 18901(b).

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<sup>3</sup> Government Code § 89001.

<sup>4</sup> Government Code § 81002(e); FPPC File No. A-02-331.

**B. Items that do not meet all of the criteria in Regulation 18901(a) are not subject to the mass mailing prohibition.**

Examples where an item does not meet all of the criteria, include the following:

1. Items that are not delivered by any means, to a person's residence, office, or post office box. For example, items that are handed out in a public area, or items that are set out for the public to pick up on their own, are not considered "delivered" under the PRA.<sup>5</sup> Delivery does, however, include any items that are hand delivered to a resident's home, business, or post office box.<sup>6</sup>
2. The item does not feature or make any reference to an elected official.
3. No public funds were not used to produce or distribute the items.
4. Two hundred items or less are sent within a calendar month.

**C. Items sent in response to an "unsolicited request" are not subject to the mass mailing prohibition of the PRA.**

A request for information is unsolicited, if it is not requested or induced by the elected officer or any other third person acting at his or her behest, pursuant to Regulation 18901(c)(4). For example, a person who subscribes to newspapers or other periodicals published by persons other than elected officers shall be deemed to have made unsolicited requests for materials published in those subscription publications.<sup>7</sup> There are a number of restrictions relating to this exception, which are fact intense. Its application will depend on whether a request was actually "unsolicited," whether the request is for a single or multiple responses, and whether the unsolicited request is subject to the maximum time period set forth in Regulation 18901. The text of Regulation 18901(c) should be consulted before relying on this exception.

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<sup>5</sup> Dale Advice Letter, FPPC No. A-02-331.

<sup>6</sup> Hobbs Advice Letter, FPPC No. A-02-336.

<sup>7</sup> A person who subscribes to newspapers or other periodicals published by persons other than elected officers are deemed to have made unsolicited requests for materials published in those subscription publications. (See Lipton Advice Letter, FPPC No. A-92-476, Gartner Advice Letter, FPPC No. A-99-224, Valenti Advice Letter, FPPC No. I-91-264 (1991); and Warren Advice Letter, FPPC No. 93-152.)

**D. Items that fall within the exceptions in Regulation 18901(b).**

An item that meets all of the criteria for the mass mailing prohibition, may not be sent at public expense, unless the item falls within the exceptions in Regulation 18901(b). The exceptions in Regulation 18901(b) allows the inclusion of an elected officer's name in certain types of mailings under certain specified circumstances. A summary of those exceptions are set forth below.

1. Items which include an elected officer's name only in the letterhead or logotype as part of the stationery, forms or envelopes of the agency.
2. A press release sent to members of the media.
3. Inter-governmental items sent in the normal course of business.
4. Intra-governmental items sent in the normal course of business.
5. Items sent in connection with the payment or collection of funds by an agency.
6. Items sent by an agency responsible for the administration of a government program where the item sent is essential to the functioning of the program.
7. Legally required mailings.
8. Telephone directories, organization charts, or similar listings or rosters which include the names of elected officers as well as other individuals in the agency.
9. Announcements of meetings or events.
10. Agendas or other writings that are required to be made available pursuant to Sections 11125.1 and 54957.5 of the Government Code, or bills, files, histories, journals, committee analyses, floor analyses, agendas of an interim or special hearing of a committee of the Legislature, or index of legislation, published by the Legislature.
11. Business cards which do not contain the elected officer's photograph or more than one mention of the elected officer's name.

M-Council  
April 22, 2003  
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A number of exceptions contain additional requirements, and are fact intense. Therefore, the text of Regulation 18901(b) should be consulted before relying on any of these exceptions. If you would like to meet to discuss this memo, please call me.

Finally, if you are unclear as to whether a particular item is subject to the mass mailing requirements, it is recommended you contact the FPPC and that you fax one particular items to the FPPC for review.

Respectfully submitted,



TEI YUKIMOTO  
Deputy City Attorney

c: Ruthie Quinto, Controller  
Daniel G. Hobbs, City Manager  
Hilda Cantú Montoy, City Attorney  
James C. Sanchez, Chief Assistant City Attorney

Attachments:

Regulation 18901  
Perea Advice Letter, FPPC No. A-02-260

TY:mg[26413mg/ty]



## FAIR POLITICAL PRACTICES COMMISSION

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(Back to Regulations of the Fair Political Practices Commission)

#### 18901. Mass Mailings Sent at Public Expense

(a) Except as provided in subdivision (b), a mailing is prohibited by Section 89001 if all of the following criteria are met:

(1) Any item sent is delivered, by any means, to the recipient at his or her residence, place of employment or business, or post office box. For purposes of this subdivision (a)(1), the item delivered to the recipient must be a tangible item, such as a videotape, record, or button, or a written document.

(2) The item sent either:

(A) Features an elected officer affiliated with the agency which produces or sends the mailing, or

(B) Includes the name, office, photograph, or other reference to an elected officer affiliated with the agency which produces or sends the mailing, and is prepared or sent in cooperation, consultation, coordination, or concert with the elected officer.

(3)(A) Any of the costs of distribution is paid for with public moneys; or

(B) Costs of design, production, and printing exceeding \$50.00 are paid with public moneys, and the design, production, or printing is done with the intent of sending the item other than as permitted by this regulation.

(4) More than two hundred substantially similar items are sent, in a single calendar month, excluding any item sent in response to an unsolicited request and any item described in subdivision (b).

(b) Notwithstanding subdivision (a), mass mailing of the following items is not prohibited by Section 89001:

(l) Any item in which the elected officer's name appears only in the letterhead or logotype of the stationery, forms (including "For Your Information" or "Compliments of" cards), and envelopes of the agency sending the mailing, or of a committee of the agency, or of the elected officer, or in a roster listing containing the names of all elected officers of the agency. In any such item, the names of all elected officers must appear in the same type size, typeface, type color, and location. Such item may not include the elected officer's photograph, signature, or any other reference to the elected officer, except as specifically permitted in this subdivision (b)(1) or elsewhere in this regulation.



(2) A press release sent to members of the media.

(3) Any item sent in the normal course of business from one governmental entity or officer to another governmental entity or officer.

(4) Any intra-agency communication sent in the normal course of business to employees, officers, deputies, and other staff.

(5) Any item sent in connection with the payment or collection of funds by the agency sending the mailing, including tax bills, checks, and similar documents, in any instance where use of the elected officer's name, office, title, or signature is necessary to the payment or collection of the funds. Such item may not include the elected officer's photograph, signature, or any other reference to the elected officer except as specifically permitted in this subdivision (b)(5) or elsewhere in this regulation.

(6) Any item sent by an agency responsible for administering a government program, to persons subject to that program, in any instance where the mailing of such item is essential to the functioning of the program, where the item does not include the elected officer's photograph; and where use of the elected officer's name, office, title, or signature is necessary to the functioning of the program.

(7) Any legal notice or other item sent as required by law, court order, or order adopted by an administrative agency pursuant to the Administrative Procedure Act, and in which use of the elected officer's name, office, title, or signature is necessary in the notice or other mailing. For purposes of this subdivision (b)(7), inclusion of an elected officer's name on a ballot as a candidate for elective office, and inclusion of an elected officer's name and signature on a ballot argument, shall be considered necessary to such a notice or other item.

(8) A telephone directory, organization chart, or similar listing or roster which includes the names of elected officers as well as other individuals in the agency sending the mailing, where the name of each elected officer and individual listed appears in the same type size, typeface, and type color. Such item may not include an elected officer's photograph, name, signature, or any other reference to an elected officer, except as specifically permitted in this subdivision (b)(8) or elsewhere in this regulation.

(9) (A) An announcement of any meeting or event of the type listed in paragraphs 1 or 2.

1. An announcement sent to an elected officer's constituents concerning a public meeting which is directly related to the elected officer's incumbent governmental duties, which is to be held by the elected officer, and which the elected officer intends to attend.

2. An announcement of any official agency event or events for which the agency is providing the use of its facilities or staff or other financial support.

(B) Any announcement provided for in this subdivision (b)(9) shall not include the elected officer's photograph or signature and may include only a single mention of the elected officer's name except as permitted elsewhere in this regulation.

(10) An agenda or other writing that is required to be made available pursuant to Sections 11125.1 and 54957.5 of the Government Code, or a bill, file, history, journal, committee analysis, floor analysis, agenda of an interim or special hearing of a committee of the Legislature, or index of legislation, published by the Legislature.

(11) A business card which does not contain the elected officer's photograph or more than one mention of the elected officer's name.

(c) The following definitions shall govern the interpretation of this regulation:

(l) "Elected officer affiliated with the agency" means an elected officer who is a member, officer, or employee of the agency, or of a subunit thereof such as a committee, or who has supervisory control over the agency, or who appoints one or more members of the agency.

(2) "Features an elected officer" means that the item mailed includes the elected officer's photograph or signature, or singles out the elected officer by the manner of display of his or her name or office in the layout of the document, such as by headlines, captions, type size, typeface, or type color.

(3) "Substantially similar" is defined as follows:

(A) Two items are "substantially similar" if any of the following applies:

1. The items are identical, except for changes necessary to identify the recipient and his or her address.

2. The items are intended to honor, commend, congratulate, or recognize an individual or group, or individuals or groups, for the same event or occasion; are intended to celebrate or recognize the same holiday; or are intended to congratulate an individual or group, or individuals or groups, on the same type of event, such as birthdays or anniversaries.

3. Both of the following apply to the items mailed:

a. Most of the bills, legislation, governmental action, activities, events, or issues of public concern mentioned in one item are mentioned in the other.

b. Most of the information contained in one item is contained in the other.

(B) Enclosure of the same informational materials in two items mailed, such as copies of the same bill, public document, or report, shall not, by itself, mean that the two items are "substantially similar." Such informational materials may not include the elected officer's name, photograph, signature, or any other reference to the elected officer except as permitted elsewhere in this regulation.

(4) "Unsolicited request" is defined as follows:

(A) A written or oral communication (including a petition) which specifically requests a response and which is not requested or induced by the recipient elected officer or by any third person acting at his or her behest. However, an unsolicited oral or written communication (including a petition) which contains no specific request for a response, will be deemed to constitute an unsolicited request for a single written response.

(B) An unsolicited request for continuing information on a subject shall be considered an unsolicited request for multiple responses directly related to that subject for a period of time not to exceed 24 months. An unsolicited request to receive a regularly published agency newsletter shall be deemed an unsolicited request for each issue of that newsletter.

(C) A previously unsolicited request to receive an agency newsletter or mass

mailing on an ongoing basis shall not be deemed to have become solicited by the sole fact that the requestor responds to an agency notice indicating that, in the absence of a response, his or her name will be purged from the mailing list for that newsletter or mass mailing. A notice in the following language shall be deemed to meet this standard:

"The law does not permit this office to use public funds to keep you updated on items of interest unless you specifically request that it do so."

Inclusion of a similar notice in other items shall not constitute a solicitation under this regulation.

(D) A communication sent in response to an elected officer's participation at a public forum or press conference, or to his or her issuance of a press release, shall be considered an unsolicited request.

(E) A person who subscribes to newspapers or other periodicals published by persons other than elected officers shall be deemed to have made unsolicited requests for materials published in those subscription publications.

Note: Authority: Section 83112, Gov. Code

Reference: Sections 82041.5 and 89001, Gov. Code

#### History

- (1) New section filed 10-18-77; effective thirtieth day thereafter.
- (2) Amendment filed 10-29-81; effective thirtieth day thereafter.
- (3) Editorial correction of subsection (d)(5).
- (4) Amendment filed 12-27-82; effective thirtieth day thereafter.
- (5) Amendment filed 8-8-88 as an emergency; effective upon filing. A Certificate of Compliance must be transmitted to OAL within 120 days or emergency language will be repealed on 12-6-88.
- (6) Reinstatement of section as it existed prior to 8-8-88 emergency amendment by operation of Government Code Section 11346.1(f).
- (7) Amendment filed 12-9-88 as an emergency readoption of amendment originally filed 8-8-88; designated effective 12-9-88. A Certificate of Compliance must be transmitted to OAL within 120 days or emergency language will be repealed on 4-8-89.
- (8) Certificate of Compliance including repealer of Section 18901 and new Section 18901 transmitted to OAL 2-9-89 and filed 3-13-89; effective thirtieth day thereafter.
- (9) Readopted as new section filed 6-29-90; effective thirtieth day thereafter.



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*2002 Cal. Fair-Pract. LEXIS 228, \**

CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION  
ADVICE LETTERS

Our File No. A-02-260

2002 Cal. Fair-Pract. LEXIS 228

September 27, 2002

**[\*1]** Henry Perea, Council President, City of Fresno, City Hall - 2600 Fresno Street, Fresno, CA 93721-3600

Re: Your Request for Advice

Dear Mr. Perea:

This letter is in response to your request for advice regarding the mass mailing provisions of the Political Reform Act (the "Act"). n1

QUESTION

May you send out 500 - 1000 copies of a flyer under your own letterhead notifying residents of a change in the neighborhood shopping center?

CONCLUSION

Yes, as long as your name only appears in the letterhead of the flyer and the flyer contains no other references to you, including your name or office.

FACTS

You have submitted a copy of a flyer that you would like to send out to the constituents who surround a particular retail shopping center. Your office has received numerous calls regarding this retail location, and you would like to notify the neighborhood of the positive changes that will be occurring at this location.

You will be mailing between 500-1000 copies or in the alternative, will have someone from your office distribute them throughout the neighborhood.

ANALYSIS

Section 89001 provides that "no newsletter or other mass mailing **[\*2]** shall be sent at public expense." Regulation **18901** (copy enclosed) interprets this provision. In pertinent part, regulation **18901** provides four criteria for what is considered a "mass mailing."

1. Delivery

"(1) Any item sent is delivered, by any means, to the recipient at his or her residence, place of employment or business, or post office box. For purposes of this subdivision (a)(1), the item delivered to the recipient must be a tangible item, such as a videotape, record, or button, or a written document." (Regulation **18901(a)(1).**)

The flyer would be a tangible item sent to residences when it is delivered either through U.S. mail or hand delivery.

## 2. Inclusion of a Reference to an Elected Officer

"(2) The item sent either:

"(A) Features an elected officer affiliated with the agency which produces or sends the mailing, or

"(B) Includes the name, office, photograph, or other reference to an elected officer affiliated with the agency which produces or sends the mailing, and is prepared or sent in cooperation, consultation, coordination, or concert with the elected officer." (Regulation **18901(a)(2).**)

P. . .P

"(1) 'Elected officer affiliated with the agency' means an elected [**\*3**] officer who is a member, officer, or employee of the agency, or of a subunit thereof such as a committee, or who has supervisory control over the agency, or who appoints one or more members of the agency."

"(2) 'Features an elected officer' means that the item mailed includes the elected officer's photograph or signature, or singles out the elected officer by the manner of display of his or her name or office in the layout of the document, such as by headlines, captions, type size, typeface, or type color." (Regulation **18901(c)(1)(2).**)

Where the elected officer initiates the mailing, exercises direction or control over the content, production, or distribution of the document, as is the case here, regulation **18901(a)(2)(B)** applies. (Kibbe-Chairs Advice Letter, No. I-89-251.) Under this standard, you cannot have your "name, office, photograph, or other reference [to yourself or your office]" in the flyer absent an exception. In all other cases, regulation **18901(a)(2)(A)** applies.

## 3. Public Moneys

"(3) (A) Any of the costs of distribution is paid for with public moneys; or

"(B) Costs of design, production, and printing. . . is done with the intent of sending the item other than as [**\*4**] permitted by this regulation." (Regulation **18901(a)(3).**)

Since you would send this flyer out from your office, using your resources, this criterion is met.

## 4. Mass Mailings

"(4) More than two hundred substantially similar items are sent, in a single calendar month, excluding any item sent in response to an unsolicited request and any item described in subdivision (b) [exceptions]." (Regulation **18901(a)(4).**)

You are proposing to send out between 500 - 1000 of these flyers thereby meeting this requirement. You mention in your letter that your "office has received a lot of calls regarding this retail location," which may be considered unsolicited requests for information. Regulation **18901(c)(4)** defines "unsolicited request" in part as:

"(A) A written or oral communication (including a petition) which specifically requests a response and which is not requested or induced by the recipient elected officer or by any third person acting at his or her behest. However, an unsolicited oral or written communication (including a petition) which contains no specific request for a response, will be deemed to constitute an unsolicited request for a single written response.

"(B) An unsolicited **[\*5]** request for continuing information on a subject shall be considered an unsolicited request for multiple responses directly related to that subject for a period of time not to exceed 24 months. An unsolicited request to receive a regularly published agency newsletter shall be deemed an unsolicited request for each issue of that newsletter."

If your constituents called your office specifically requesting information regarding this project, sending them this flyer is responding to an unsolicited request. If this is the case, then the flyers sent in response to those calls are not counted against your 200-item per month limit. For example, if 50 people called and inquired about this specific subject, and this flyer directly addresses their concerns, then flyers could be sent to those 50 people. Since the 50 flyers fall within the exception for responses to unsolicited specific requests, you would still be able to send out 200 additional items in that same calendar month.

Also, if those callers specifically requested continuing, updated information, without your solicitation, then you could continue to send them information as the situation changes. However, if the callers do not explicitly **[\*6]** request continuing information, you may still mail one response to their inquiry (the flyer) and not count it against your 200-item per calendar month limit. Since the Commission is not the finder of fact, you will have to determine if the callers explicitly requested continuing information. (In re Oglesby (1975) 1 FPPC Ops. 71, 77.)

#### Exceptions to Regulation **18901**

Regulation **18901**(b) describes 11 exceptions to the mass mailing prohibition. Only one of these exceptions pertains to your facts. Subsection (b)(1) of regulation **18901** provides the relevant exception to the mass mailing prohibition:

"(1) Any item in which the elected officer's name appears only in the letterhead or logotype of the stationery, forms (including 'For Your Information' or 'Compliments of' cards), and envelopes of the agency sending the mailing, or of a committee of the agency, or of the elected officer, or in a roster listing containing the names of all elected officers of the agency. In any such item, the names of all elected officers must appear in the same type size, typeface, type color, and location. Such item may not include the elected officer's photograph, signature, or any other reference to the **[\*7]** elected officer, except as specifically permitted in this subdivision (b)(1) or elsewhere in this regulation. (Emphasis added.)

This is known as the "**letterhead exception**." This exception does not apply if the mailing makes any other reference to the elected officer. The flyer will be sent out on your letterhead. These letters, however, will also include other references to you with the use of the words "I" and "we." Since the flyer makes references to you in addition to the reference in the letterhead, the **letterhead exception** does not apply to your facts. (Bustamante Advice Letter, No. A-99-265; see also Fisicaro Advice Letter, No. A-96-230 and White-Brown Advice Letter, No. A-96-097, supra.) Therefore, you may not send or deliver more than 200 flyers in a calendar month, in addition to the flyers sent in response to the unsolicited requests for information.

The flyer that you submitted has letterhead that contains the phrase "From the Office of Council President Henry Perea." This contains not only your name, but also a personal reference to you, namely that the information is from your office. The personal reference is

prohibited under the exception in regulation **18901(b)(1) [\*8]** and may not be included in the letterhead. (White-Brown Advice Letter, No. A-96-097.) However, regulation **18901(b)(1)** does permit "For your information" and "Compliments of" cards to be attached to materials sent at public expense. This exception is separate from the "**letterhead exception**."

In order to send out the flyers without a quantitative limit, you would need to remove all references to yourself, only leaving your name in the letterhead. By making this flyer less personalized, you would then qualify for the **letterhead exception** and be able to mail or deliver the information to the 500 - 1000 people you wish to target.

If you have any other questions regarding this matter, please contact me at (916) 322-5660.

Sincerely,

Luisa Menchaca

General Counsel

By:  
Galena West  
Counsel, Legal Division

**FOOTNOTES:**

n1 Government Code sections 81000 - 91014. Commission regulations appear at Title 2, sections 18109-18997, of the California Code of Regulations.

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Source: [Legal > States Legal - U.S. > California > Agency & Administrative Materials > California Fair Political Practices Commission](#) ⓘ

Terms: **18901 and letterhead exception** ([Edit Search](#))

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